

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

WILLIAM RYAN and JOHN J. SHAUGHNESSY,
as they are TRUSTEES, INTERNATIONAL UNION
OF OPERATING ENGINEERS LOCAL 4 HEALTH
AND WELFARE, PENSION AND ANNUITY FUNDS,
and LOUIS G. RASETTA and CHRISTOPHER
BARLETTA, as they are TRUSTEES, HOISTING AND
PORTABLE ENGINEERS LOCAL 4 APPRENTICE
AND TRAINING FUNDS and INTERNATIONAL
UNION OF OPERATING ENGINEERS, LOCAL 4,
Plaintiffs

vs.

MKM SITE DEVELOPMENT CORP.,
Defendant

C.A. No. 03-12248 RWZ

VERIFIED REQUEST TO ENTER DEFAULT

Plaintiffs William Ryan and John J. Shaughnessy, as they are Trustees, International Union of Operating Engineers Local 4 Health and Welfare Fund, et al, request the Clerk to enter the default of MKM Site Development Corp. (hereinafter "MKM"). This request is made pursuant to Rule 55(a), Fed.R.Civ.P. In support of this request, the Plaintiffs say:

- 1) This action was filed on November 14, 2003.
- 2) Complaint was served on defendant MKM on November 19, 2003.
- 3) MKM has never filed an Answer or a responsive pleading to the Complaint.

WHEREFORE, plaintiffs seek the entry of Default in this matter.

Respectfully submitted,

WILLIAM RYAN and JOHN J.
SHAUGHNESSY, as they are TRUSTEES,
I.U.O.E. LOCAL 4 HEALTH AND
WELFARE FUND, et al,

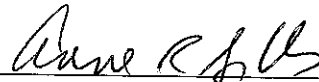
By their attorneys,



Anne R. Sills, Esquire
BBO #546576
Segal, Roitman & Coleman
11 Beacon Street
Suite #500
Boston, MA 02108
(617) 742-0208

VERIFICATION

I, Anne R. Sills, verify that I have read this Verified Request to Enter Default and that the facts set out in the Request are true to the best of my knowledge and belief.



Anne R. Sills, Esquire

Dated: April 28, 2004

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above Verified Request to Enter Default has been served by certified and first class mail upon the defendant, MKM Site Development Corp. at 69 Milk Street, Suite #200, Westborough, MA 01581 this 28th day of April, 2004.



Anne R. Sills, Esquire